Commonwealth of Kentucky Division for Air Quality

PERMIT APPLICATION SUMMARY FORM

Completed by: Andrew True

GENERAL INFORMATION:	
Name:	Air Products and Chemicals, Inc.
Address:	412 North Main Street
	Calvert City, KY 42029
Date application received:	1/09/2008
SIC Code/SIC description:	2869, Industrial Organic Chemicals
Source ID:	21-157-00009
Source A.I. #:	2915
Activity ID:	APE20080001
Permit:	V-07-009 R1
APPLICATION TYPE/PERMIT ACTIVITY	/:
[] Initial issuance	[] General permit
[X] Permit modification	[] Conditional major
X Administrative	[X] Title V
— Minor	[] Synthetic minor
Significant	[X] Operating
[] Permit renewal	[] Construction/operating
COMPLIANCE SUMMARY:	
[] Source is out of compliance[] Compliance certification s	<u> •</u>
APPLICABLE REQUIREMENTS LIST:	
[] NSR	[X] NSPS [X] SIP
[] PSD	[X] NESHAPS [] Other
[] Netted out of PSD/NSR	[] Not major modification per 401 KAR 51:001, 1(116)(b)
MISCELLANEOUS:	
[] Acid rain source	
[] Source subject to 112(r)	
[] Source applied for federal	•
•	alternative operating scenarios
[X] Source subject to a MAC	
	-case 112(g) or (j) determination
[] Application proposes new	
[X] Certified by responsible of	
[X] Diagrams or drawings inc	
	ormation (CBI) submitted in application
[] Pollution Prevention Mea	
[] Area is non-attainment (li	st pollutants):

EMISSIONS SUMMARY:

Pollutant	Actual (tpy)*	Potential (tpy)
PM/PM_{10}	17.33	34.04
SO_2	5.63	3.14
NOx	167.39	360.36
СО	90.86	327.06
VOC	188.21	1116.43
Single HAPs > 10 tpy		
Vinyl Acetate Monomer	33.51	33.95
Hydrochloric Acid	2.77	15.70
Methanol	22.44	24.42
Source wide HAPs	63.92	84.83

^{*} Actual emissions taken from the "2006 Emission Inventory Survey" (TEMPO).

SOURCE DESCRIPTION:

Air Products and Chemicals, Inc. (Air Products), Calvert City, is a chemical manufacturing plant. The source is a major source, as defined by 401 KAR 52:020 Title V Permits, for the potential emissions of over 100 tons per year of nitrogen oxides (NO_X), carbon monoxide (CO), and volatile organic compounds (VOC), the potential of a single hazardous air pollutant (HAP) greater than 10 tons per year, and the potential combined HAP emissions greater than 25 tons per year.

The source is also a major source, as defined by 401 KAR 51:017 Prevention of Significant Deterioration of Air Quality (PSD), for potential emissions of over 100 tons per year of NO_X, CO, and VOC.

For the purpose of Title V permitting, this facility is split into the following areas:

- 1. Acetylenics (Specialty Additives) Production Unit
- 2. Plant Utilities
- 3. Cogeneration Plant

ADMINISTRATIVE PERMIT AMENDMENT V-07-009 R1:

Air Products and Chemicals (APCI) decided to sell its polymer operations at the Calvert City facility to Wacker Chemie AG (Wacker). An application for the modification of the APCI Title V Permit (V-07-009) was received by the Division for Air Quality (Division) on January 9, 2008. Wacker submitted a permit application to the Division for the transfer of the APCI polymers related emission points to their existing TV Permit (V-06-001). This application was received by the Division on December 17, 2007. APCI will retain ownership of the North and South VCM Thermal Oxidizers (B-27 and B-39) and will continue to be regulated under 40 CFR Part 61 Subpart F (National Emission Standards for Hazardous Air Pollutants- Vinyl Chloride).

Below is a list of units being transferred as a result of the agreement between Air Products and Chemicals (APCI) and Wacker Chemie AG (Wacker).

Emission Units Owned by Air Products Transferred to Wacker

Emission	Units Owned by Air	Products Transferred to Wacker
Title V ID	Equipment ID	Description
A-54	FB-1510	Vinyl Acetate Monomer Day Tank
A-54-1	FB-1511	Vinyl Acetate Monomer Day Tank
A-80	FB-1515	Vinyl Acetate Monomer Storage Tank
B-13	FB-1516	Vinyl Acetate Monomer Storage Tank
A-94	BA-7501	Ethylene Unloading Flare
50 B-94	DC-7202 FA-7203	AF #1 Reactor / Stripper
A-93	FA-7106	AF #1 R1 Post Add Tank
A-93	FA-7110	AF #1 Functional Monomer Tank
A-93	FA-7111A	AF #1 Redox 1A Tank
A-93	FA-7111B	AF #1 Redox 1B Tank
A-93	FA-7112	AF #1 Redox #2 Tank
A-93	FA-7166	AF #1 Treat Tank
A-99	FA-7109	AF #1 Premix Tank
B-44	FA-7141 (to be replaced with FA-7168)	AF#1 Monomer Delay Tank
51 B-94	DC-7203 DC-7206	AF #2 Reactor / Stripper
A-93	FA-7118	AF #2 Functional Monomer Tank
A-93	FA-7119A	AF #2 Redox 1A Tank
A-93	FA-7119B	AF #2 Redox 1B Tank
A-93	FA-7120	AF #2 Redox 2 Tank
A-93	FA-7121	AF #2 Treat Tank
A-93	FA-7167	AF #2 R1 Post Add Tank
B-01	FA-7117	AF #2 Premix Tank
L	1	1

Title V ID	Equipment ID	Description
B-45	FA-7142 (to be replaced with FA-7169)	AF#2 Monomer Delay Tank
52	DC-7204 FA-7208 FA-7209	AF #3 Reactor / Stripper AF #3 Dirty Water Tank
C-35	FA-7124	AF #3 Monomer Tank
C-35	FA-7125	AF #3 Functional Monomer Tank
C-35	FA-7126A	AF #3 Redox 1A Tank
C-35	FA-7126B	AF #3 Redox 1B Tank
C-35	FA-7146	AF #3 Redox 2 Tank
C-35	FA-7147	AF #3 Stripper Post Add Tank
C-35	FA-7156	AF #3 Redox 2 Tank
C-35	FA-7157	AF #3 Stripper Redox Tank
B-02	FA-7132	AF #3 Premix Tank
B-94	BA-7502	Airflex #4 Flare
B-94	DC-7401 FA-7402	Airflex #4 Reactor / Stripper
C-03	FA-7114	AF #4 Post Add Tank
C-03	FA-7403	AF #4 Premix Tank
C-03	FA-7406A	AF #4 Redox 1A Tank
C-03	FA-7406B	AF #4 Redox 1B Tank
C-03	FA-7407	AF #4 Redox 2 Tank
C-03	FA-7412	AF #4 R1 Post Add Tank
C-03	FA-7733	AF #4 Condensate Hold Tank
C-41	FA-8503	AF #5 Premix Tank
C-41	FA-8505	AF #5 Functional Monomer Tank
C-41	FA-8506A	AF #5 Redox 1A Tank
C-41	FA-8506B	AF #5 Redox 1B Tank
C-41	FA-8507	AF #5 Redox 2 Tank

Title V ID	Equipment ID	Description
C-41	FA-8512	AF #5 Treat Tank
C-41	FA-8514	AF #5 Post Add Treat Tank
C-43	DC-8501 FA-8502	Airflex #5 Reactor / Stripper
48	DC-7201	Atmospheric Reactor
A-93	FA-7103	ATM Redox 2 Tank
A-93	FA-7105	ATM Post Add Treat Tank
A-93	FA-7108	ATM Redox 1A Tank
A-96	FA-7102	ATM Premix Tank
A-97	FA-7101	ATM Monomer Tank
A-98	FA-7201	ATM Blender
B-03	FA-7133	ATM Functional Monomer Tank
53	FB-7002	Caustic-Methanol Chemical Clean Tank
53	FB-7003	Caustic-Methanol Chemical Clean Tank
C-50	FB-7043	Fresh Chem Clean Tank
Insignificant	FA-7114, 7115, 7153	AF#1 / #2 Shared In-Process Defoamer Tanks (insignificant activity)
Insignificant	FA-7159 – 7161	AF#3 In-Process Defoamer Tanks (insignificant activity)
Insignificant	FA-7420 - 7423	AF#4 / #5 Shared In-Process Defoamer Tanks (insignificant activity)
Insignificant	FA-7411	In-Process Defoamer feed Tank (insignificant activity)
99	FB-7504	DMF Storage Tank (insignificant activity)
A-84	FB-7503	Out of service tank (insignificant activity)
A-87	FB-7560	Aqua Ammonia Tank (insignificant activity)
A-87, B-93	FB-7558, 7559, & 7561	Surfactant Tanks (insignificant activity)
A-87, C-15	FB-7570	Surfactant Tank (insignificant activity)
A-87, C-15	FB-7573	Surfactant Tank (insignificant activity)
A-87, C-15	FB-7578	Surfactant Tank (insignificant activity)
A-89	FB-7601 - 7606	Emulsion Storage Tanks (insignificant activity)

Title V ID	Equipment ID	Description
A-89	FB-7607	Aerosol A-102 Tank (insignificant activity)
A-89	FB-7608	Rhodapon LX-28/AEP Tank (insignificant activity)
A-89	FB-7609	Surfactant Tank (insignificant activity)
A-89	FB-7610	Surfactant Tank (insignificant activity)
A-90	FB-7610A - 7618	Emulsion Storage Tanks (insignificant activity)
A-91, A-92	FB-7619 - 7627	Emulsion Storage Tanks (insignificant activity)
B-35	FA-7215 - 7216	Emulsion Storage Tanks (insignificant activity)
B-36	FB-7628 - 7634	Emulsion Storage Tanks (insignificant activity)
B-40	FB-7635	Emulsion Storage Tank (insignificant activity)
B-41	FB-7636	Emulsion Storage Tank (insignificant activity)
B-42	FB-7637	Emulsion Storage Tank (insignificant activity)
B-43	FB-7638	Emulsion Storage Tank (insignificant activity)
B-46	FB-7502	NMA / MAMD Storage Tank (insignificant activity)
B-47	FB-7501	Acrylamide Storage Tank (insignificant activity)
B-48	FB-7508	TBHP Storage Tank (insignificant activity)
B-93	FB-7551 - 7554	Surfactant Tanks (insignificant activity)
B-93	FB-7556	Surfactant Tank (insignificant activity)
C-02	FB-7639 - 7644	Emulsion Storage Tanks (insignificant activity)
C-04	FB-7441	Emulsions Wastewater Tank (insignificant activity)
C-06	FB-7645 - 7647	Emulsion Storage Tanks (insignificant activity)
C-27	FB-7648 - 7650	Emulsion Storage Tanks (insignificant activity)
C-42	FB-7651 - 7653	Emulsion Storage Tanks (insignificant activity)
Insignificant	FB-7509	MAMD / NMA Storage Tank (insignificant activity)
Insignificant	FA-7009	Sulfuric Acid Tank (insignificant activity)
Insignificant	HA-7432	Hydrogen Peroxide Tank (insignificant activity)
F-04	FUG-EMUL	Emulsions Fugitive Emissions (VAM and Ethylene - includes former EP A-11)

Title V ID	Equipment ID	Description
M-07	EF-0301 Cell 1 EF-0302 Cell 2 EF-0303 Cell 3	#2 & #4 Cooling Towers

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

In order to preclude applicability of 401 KAR 51:017, Prevention of Significant Deterioration of Air Quality (PSD) for VOC, the source had elected to accept group emission limits in previous permits. These limits are reflected in Section D of the permit.

OPERATIONAL FLEXIBILITY:

None